

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL C. MAYO,)	
)	
Plaintiff,)	Case No.: 1:21-cv-04653
)	
v.)	Hon. Judge John J. Tharp, Jr.
)	Mag. Judge M. David Weisman
LARRY GAVIN, KAREN JONES-)	
HAYES, DAMITA DELITZ, BRENDAN)	
LOMBARDI, DIRECTOR MILLER,)	
OFFICER SHELDON BUCHANAN, LT.)	
FENDLEY DOUGE, & THOMAS)	
DART, in his official capacity,)	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to the Court’s Order (Dkt. 60), Plaintiff Michael Mayo (“Plaintiff”) and Defendants Larry Gavin, Damita Delitz, Brendon Lombardi, Director Miller, Officer Buchanan, Thomas Dart, and Lieutenant Douge (collectively, “Defendants”)¹ (together with Plaintiff, the “Parties”) respectively submit the following joint status report regarding the progress of the Parties’ written discovery.

On July 11, 2022, Plaintiff propounded to Defendants his First Set of Requests for Production of Documents and First Set of Interrogatories (“Plaintiff’s Written Discovery”). Likewise, on July 11, 2022, Defendants propounded to Plaintiff their First Set of Requests to Produce Documents, as well as Defendant Gavin’s First Set of Interrogatories (“Defendants’ Written Discovery”). On August 24, 2022, the Parties exchanged responses and objections to their respective written discovery, and the Parties also exchanged document productions at this time.

¹ Defendant Karen Jones-Hayes was served on October 15, 2022; her counsel has not yet appeared in this case.

Beginning on September 21, 2022 and continuing in the weeks that followed, the Parties met and conferred regarding Defendants' responses and objections to certain interrogatories and requests for production in Plaintiff's Written Discovery, as well as additional responsive documents yet to be produced by Defendants. During this meet and confer process, Defendants agreed to supplement their interrogatory responses with missing or incomplete information by October 18, 2022. Defendants also agreed to conduct additional searches for documents responsive to Plaintiff's Written Discovery and to produce such documents by no later than October 25, 2022.

As of this Joint Status Report, Plaintiff is still awaiting Defendants' supplemental interrogatory responses and document productions. Given the passage of time since this case was filed, Plaintiff requests that Defendants be directed to supplement their interrogatory responses and substantially complete their document production by a date certain. Until that supplementation occurs, it is unknown whether the Parties have any outstanding or ongoing written discovery disputes.

Defendants Response

Defense counsel made good faith efforts to comply with the Plaintiff's proposed timeline. The defendants have produced 872 pages of responsive documents and countless videos of the incidents. Following a meet and confer on October 7, 2022, the plaintiff's counsel provided defendants a list of 15+ issues to follow up on. The defendants diligently responded piece mail to each of those items over the last few weeks and only a few remain. Those remaining issues include (a) implementation of certain policies, (b) ERT response data for the subject tier for 2020-2021 and (c) information concerning the location of Plaintiff's hearing following his 5/21/20 incident. The defendants are still investigating those issues and will provide information, if any, in the next few 14-21 days.

DATED: November 1, 2022

Respectfully submitted,

/s/ David J.Zott

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 1, 2022, I caused a true and correct copy of the foregoing JOINT STATUS REPORT, to be filed through the Court's Electronic Case Filing system, which will send notification to all counsel of record.

/s/ David J. Zott

David J. Zott